

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: CHRISTOPHER J. THOMAS  
DEBTOR**

**CASE NO: 14-10132  
CHAPTER 13**

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**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

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**COMES NOW**, the Debtor, Christopher J. Thomas and files this his Response to the Trustee's Motion to Dismiss showing the court as follows:

The Debtor respectfully requests that his Chapter 13 not be dismissed. That he admits he is behind but will be able to catch up the payments and complete the plan. And he had just cause for his plan payments to get behind. The Debtor will send in the delinquent amount by the due date of April 22, 2019.

**WHEREFORE**, the Debtor requests that the court deny the Trustee's Motion to Dismiss and that he be allowed to catch up his payments and for such other and further relief that this court deems just and proper under the circumstances.

Respectfully submitted,

Christopher J. Thomas

BY: /s/ R. Gawyn Mitchell  
R. GAWYN MITCHELL, 3383  
Attorney at Law

**CERTIFICATE OF SERVICE**

I, R. Gawyn Mitchell, Attorney for the Debtor, hereby certify that I electronically filed the foregoing Response to the Trustee's Motion to Dismiss with the Clerk of the Court, using the ECF system, which sent electronic notification of such filing to Terre M. Vardaman, [VARDAMAN13ECF@gmail.com](mailto:VARDAMAN13ECF@gmail.com), Chapter 13 Trustee, and the United States Trustee, [USTPRegion05.AB.ECF@usdoj.gov](mailto:USTPRegion05.AB.ECF@usdoj.gov).

DATED: April 4, 2019

/s/ R. Gawyn Mitchell  
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